

1 JASON M. FRIERSON
2 United States Attorney
3 District of Nevada
4 Nevada Bar No. 7709
5 VIRGINIA T. TOMOVA
6 Assistant United States Attorney
7 Nevada Bar Number 12504
8 501 Las Vegas Blvd. So., Suite 1100
9 Las Vegas, Nevada 89101
10 (702) 388-6336
11 Virginia.Tomova@usdoj.gov

12 *Attorneys for the Federal Defendant*

13 **UNITED STATES DISTRICT COURT**
14 **DISTRICT OF NEVADA**

15 Adriana Sierra,

16 Plaintiff,

17 v.

18 United States Department of Education;
19 Equifax Information Services LLC; and
20 Experian Information Solutions, Inc.

21 Defendant.

22 Case No. 2:24-cv-00296-APG-MDC

23 **Stipulation and Order to Extend Time**
24 **to File a Response**

25 **(Second Request)**

26 Pursuant to Rule 6(b)(1) of the Federal Rules of Civil Procedure and Rule IA 6-1 of
27 this Court's Local Rules, Plaintiff Adriana Sierra and Federal Defendant United States
28 Department of Education, through undersigned counsel, hereby stipulate and agree as
follows:

29 Plaintiff filed her complaint on February 12, 2024. ECF No. 1.

30 Plaintiff served Federal Defendant with a copy of the Summons and Complaint on
31 February 20, 2024. ECF No. 5.

32 The current deadline for Federal Defendant to respond to Plaintiff's Complaint is
33 May 22, 2024.

34 On May 20, 2024, counsel for Plaintiff and Federal Defendant agreed to a 30-day
35 extension to allow additional time for Federal Defendant to retrieve all documents from the

1 agency relevant to the allegations in the complaint, review them and respond to the
2 allegations in Plaintiff's Complaint.

3 Accordingly, the parties, through undersigned counsel, submit this stipulation to a
4 30-day extension from **May 22, 2024**, to **June 21, 2024**, for Federal Defendant to file a
5 Response to the Complaint. This is the second request for an extension of time.

6 This stipulated request is filed in good faith and not for the purposes of undue delay.

7 Respectfully submitted this 21st day of May 2024.

8 FREEDOM LAW FIRM, LLC

JASON M. FRIERSON
United States Attorney
Nevada Bar No. 7709

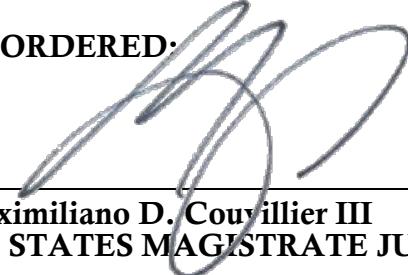
10 /s/ Gerardo Avalos
11 GERARDO AVALOS, ESQ.
Nevada Bar No. 15171
8985 S. Eastern Ave., Suite 100
12 Las Vegas, Nevada 89123

13 *Attorneys for Plaintiff*

/s/ Virginia T. Tomova
VIRGINIA T. TOMOVA
Assistant United States Attorney
Nevada Bar Number 12504

14 U.S. ATTORNEY'S OFFICE
501 S. Las Vegas Blvd., Suite 1100
Las Vegas, Nevada 89101

15 *Attorneys for the Federal Defendant*

16 IT IS SO ORDERED:
17 
18

19 Hon. Maximiliano D. Couvillier III
20 UNITED STATES MAGISTRATE JUDGE

21 DATED: 5/22/2024
22
23
24
25
26
27
28